

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

THE PLASTIC SURGERY CENTER,  
P.A.,

*Plaintiff,*

v.

UNITED HEALTHCARE INSURANCE  
COMPANY, XYZ CORPS. 1-10,

*Defendants.*

Case No.: 3:24-cv-10033-MAS-TJB

**CONSENT ORDER  
EXTENDING DEFENDANT'S  
TIME TO RESPOND TO THE  
COMPLAINT**

**WHEREAS**, Defendant UnitedHealthcare Insurance Company s/h/a United Healthcare Insurance Company (“Defendant”) removed this lawsuit from the Superior Court of New Jersey, Monmouth County (Case number MON-L-003133-24) on October 24, 2024.

**WHEREAS**, on October 30, 2024, Defendant filed an Application and Proposed Order for Clerk’s Order to Extend Time to Answer, Move or Otherwise Respond to the Complaint (Doc. No. 6), seeking an extension to and including November 14, 2024, which was granted on October 31, 2024;

**WHEREAS**, on November 13, 2024, Defendant filed a Consent Order Extending Defendant’s Time to Answer, Move or Otherwise Respond to Complaint (Doc. No. 8), seeking an extension to and including December 16, 2024, which was granted on November 13, 2024;

**WHEREAS**, Defendant is still in the process of investigating the allegations in the Complaint, including locating the communications referenced in the Complaint, and requires an extension to locate and review the documentation/information and provide a meaningful response to the allegations related thereto and thus, respectfully requests a thirty (30) day extension of time to do so in the above-captioned matter from December 16, 2024, through and including January 16, 2025.

**WHEREAS**, Plaintiff has consented to Defendant's request for an extension of thirty (30) days to respond to the Complaint;

IT IS HEREBY, ORDERED that Defendant's time to file its response to the Complaint in the above-captioned matter is extended to and including January 16, 2025.

**Dated:** December 13, 2024

s/Tonianne J. Bongiovanni  
Hon. Tonianne J. Bongiovanni, U.S.M.J.